

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**THOSE CERTAIN UNDERWRITERS AT
LLOYD'S, LONDON, SUBSCRIBING TO)
CERTIFICATE NO. SUAWS50147-2001,)
)
Plaintiff,)
)
)
vs.) Case No.: 1:23-cv-00037-JHR-GJF
)
)
**U-DRIVE ACCEPTANCE CORPORATION,
INC., ABQ, INC. and EUGENE SALAZAR,**)
)
)
Defendants.)**

UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

PLAINTIFF, Those Certain Underwriters at Lloyd's, London, Subscribing to Certificate No. SUAWS50147-2001, through counsel of record, hereby move the Court for leave to file their First Amended Complaint, attached hereto as Exhibit A. As grounds for this Motion, Plaintiff states:

1. Plaintiff desires to name FJS, LLC, as a party to ensure that all parties that may be affected by the Court's rulings have a full and fair opportunity to litigate the pertinent issues.
2. The Motion is timely.
3. Defendant Eugene Salazar, who is the only defendant who has entered an appearance in this case, does not oppose the Motion.

WHEREFORE, Plaintiffs respectfully request that the Court grant them leave to file the attached First Amended Complaint.

Respectfully submitted,

Dated: July 28, 2023

MADISON, MROZ, STEINMAN,
KENNY & OLEXY, P.A.

By: /s/Gregory D. Steinman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of July 2023, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the notice of electronic filing.

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